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January 19, 2018

Via ECF

Honorable William H. Pauley
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Williams, et al v. U.S., et al., No. 17 Civ. 6779 (WHP)

Dear Honorable Judge Pauley:

Pursuant to Your Honor's Individual Practices and FRCP 26(f), the parties have met and conferred regarding discovery in this matter. As the defendant plans on submitting a pre-answer motion to dismiss and plaintiff anticipates amending her complaint and considering the estate and guardianship issues which are in the process of being resolved, the parties believe a short delay engaging in discovery may be warranted.

The parties are able to represent they do not anticipate needing ESI discovery. Further, the parties also aren't opposed to mediation, however until such time as the defendants' anticipated motion to dismiss is decided, mediation may not be fruitful. Finally, the parties anticipate the need for expert discovery on both issues of liability and damages.

Thank you.

Respectfully submitted,


Andrew C. Laufer

Enc.:
ACL/